## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11340 DPW

STEPHEN KEEFE,
Plaintiff
v.
LOCAL 805, INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION, AFL-CIO,
LOCAL 800, INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION, AFL-CIO,
and LOCAL 799, INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION, AFL-CIO,
Defendants

## **VERDICT**

- 1. In regard to the Plaintiff's claim of illegal retaliation, please answer the following question.
  - a. Has the Plaintiff proven by a preponderance of the evidence that by suspending him and placing him back in Gang 12, the Defendants illegally retaliated against him?

Yes	No	

If you have answered NO to Question 1, do not answer Question 2 but simply return your verdict. If you have answered YES to Question 1, proceed to question 2

2. Was the Defendant's retaliation upon the Plaintiff the proximate cause of the Plaintiff's damages?

Yes	No	•

If you have answered NO to Question 2, do not answer Question 3 but simply return your verdict. If you have answered YES to Question 2, proceed to question 3.

3. What amount of money would fairly and reasonably compensate the Plaintiff for the following harm and/or losses caused by the Defendants with regard to this claim? Answer in a DOLLAR amount or NONE in each blank

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Date		· ·	Foreperson